

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF AND OVERNIGHT MAIL

August 15, 2017

The Honorable George B. Daniels
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States
Courthouse
500 Pearl Street
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Daniels:

The Plaintiffs' Executive Committees, on behalf of all plaintiffs, write to respectfully request a modest extension of the deadline for plaintiffs' briefs in opposition to the motions to dismiss of the Kingdom of Saudi Arabia and Saudi High Commission for Relief of Bosnia & Herzegovina ("SHC"), from October 2, 2017 to November 2, 2017. The Kingdom and SHC have advised that they consent to the proposed extension.

The requested extension is needed to allow sufficient time for the coordination of the several opposition briefs among the numerous firms representing plaintiffs in this multi-district litigation proceeding, in order to ensure the clearest and most orderly presentation of the issues to the Court. In this regard, the PECs note that the plaintiffs who are signatories to the Consolidated Amended Complaint ("CAC") are represented by more than 20 separate law firms, 8 of which hold seats on the PECs. The Kingdom and SHC filed separate motions to dismiss the CAC, and separate briefs in support of those motions, and as a result the PECs are tasked with coordinating consolidated oppositions to those two separate filings on behalf of all of the CAC plaintiffs. In addition, pursuant to this Court's April 13, 2017 Order, the *Ashton* plaintiffs will be filing a separate brief in opposition to the defendants' motion to dismiss their separate complaint. As the Kingdom has offered certain common legal arguments in support of its motions to dismiss the CAC and the separate *Ashton* complaint, the PECs anticipate working

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with the *Ashton* plaintiffs to minimize redundancy in relation to those issues in their separate briefs. After conferring at length, the PECs anticipate that some additional time will be needed to coordinate these multiple filings among the many firms and lawyers involved, and therefore respectfully request that the deadline for the CAC plaintiffs' and *Ashton* plaintiffs' oppositions to the motions to dismiss of the Kingdom and SHC be extended to November 2, 2017.

The Plaintiffs' Executive Committees thank Your Honor for the Court's attention to this matter.

Respectfully submitted,

COZEN O'CONNOR

A handwritten signature in blue ink, appearing to read "Sean P. Carter", with a stylized flourish extending to the right.

By: Sean P. Carter

SPC:/bdw

cc: The Honorable Sarah Netburn (via ECF)
All MDL Counsel of Record (via ECF)

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